

1 WILLIAM N. CARLON (State Bar No. 305739)
2 Law Office of William Carlon
3 437 Post Street
4 Napa, CA 94559
5 Tel: (530) 514-4115
6 Email: william@carlonlaw.com

7 ERINA KWON (Bar No. 235079)
8 Email: erina@lawaterkeeper.org
9 BENJAMIN A. HARRIS (Bar No. 313193)
10 Email: ben@lawaterkeeper.org
11 LOS ANGELES WATERKEEPER
12 360 E 2nd Street Suite 250
13 Los Angeles, CA 90012
14 Phone: (310) 394-6162

15 Attorneys for Plaintiff
16 LOS ANGELES WATERKEEPER

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 LOS ANGELES WATERKEEPER,

20 Plaintiff,

21 vs.

22 ACCURATE STEEL TREATING, INC.,

23 Defendant.

Case No. 2:24-cv-07503-MWC-SSC

STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINES SET BY COURT;
[PROPOSED] ORDER

[Filed concurrently with Declaration of William Carlon]

STIPULATION

Pursuant to Local Rule 40-1 and the Court's standing order at paragraph 13, as supported by the accompanying Declaration of William Carlon, Plaintiff Los Angeles Waterkeeper and Defendant Accurate Steel Treating, Inc. through undersigned counsel hereby stipulate and respectfully request that the Court extend all deadlines currently set by the Court by ninety (90) days. The Parties declare in support of this request:

WHEREAS, on September 3, 2024, Plaintiff filed the complaint initiating this action (ECF No. 1);

WHEREAS, on October 15, 2024, Defendant filed its answer (ECF No. 11);

WHEREAS, on November 8, 2024, the Parties filed their Rule 26(f) Report (ECF No. 18), and on December 5, 2024, the Court issued its scheduling order (ECF No. 24);

WHEREAS, the Parties have been engaged in good faith settlement negotiations and have exchanged several drafts of a consent decree;

WHEREAS, the Parties have made significant progress in reaching a settlement, and are currently waiting on a technical consultant to provide the details of proposed Best Management Practices;

WHEREAS, the Parties wish to continue the settlement discussions without expending significant resources on conducting fact and expert discovery, and therefore the Parties agree to seek a 90-day extension to all deadlines currently set by Court order.

WHEREFORE, the Parties hereby stipulate and respectfully request that the Court extend all case deadlines as follows:

(1) The deadline for fact discovery be extended from September 12, 2025 to December 11, 2025;

(2) The deadline for initial expert disclosures be extended from September 19, 2025 to December 18, 2025;

(3) The deadline for rebuttal expert disclosures be extended from October 3, 2025 to January 1, 2025;

(4) The deadline for expert discovery be extended from October 17, 2025 to January 15, 2026;

(5) The last day to hear motions be extended from December 5, 2025 to March 5, 2026;

(6) The deadline to complete a settlement conference before a magistrate judge be extended from December 19, 2025 to March 19, 2026;

(7) The deadline for the first round of trial filings be extended from January 30, 2026 to April 30, 2026;

(8) The deadline for the second round of trial filings be extended from February 13, 2026 to May 14, 2026;

(9) The final pretrial conference and hearings on motions in limine be extended from February 27, 2026 to May 27, 2026; and,

(10) The trial dates be extended from March 16, 2026 to June 15, 2026.

Dated: July 1, 2025

Respectfully Submitted,

LAW OFFICE OF WILLIAM CARLON

By: /s/ William N. Carlon

William N. Carlon
Attorneys for Plaintiff
LOS ANGELES WATERKEEPER

Dated: July 1, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Ryan Matthews

Signature authority
granted via email
on July 1, 2025

Ryan Matthews
Attorneys for Defendant
ACCURATE STEEL TREATING, INC.

PURSUANT TO STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated: _____

Honorable Michelle W. Court
United States District Judge

ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 1, 2025

LAW OFFICE OF WILLIAM CARLON

By: /s/ William N. Carlon

William N. Carlon
Attorneys for Plaintiff
LOS ANGELES WATERKEEPER